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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

15 M 0618

UNITED STATES OF AMERICA

- against -

JENNIE LEMAY,

Defendant.

AFFIDAVIT IN SUPPORT OF
ARREST WARRANT

Mag. No. _____

(T. 18, U.S.C., § 2251)

EASTERN DISTRICT OF NEW YORK, SS:

PATRICIA PLIVA, being duly sworn, deposes and states that she is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about and between July 2011 and April 2012, all dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JENNIE LEMAY did knowingly and intentionally conspire to employ, use, persuade, induce, entice, and coerce one or more minors to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions would be produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 2251(a) and 2251(e))

The source of my information and the grounds for my belief are as follows:¹

AGENT BACKGROUND

1. I have been employed as a Special Agent with HSI since 2006 and am currently assigned to the New York Office. For approximately two years, I have been assigned to a Child Exploitation Group. I have been assigned to investigate violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through training in classes and daily work related to conducting these types of investigations. I have participated in a number of investigations into the receipt, possession, and/or distribution of child pornography by electronic means, as well as the sexual enticement and exploitation of minors.

2. I am familiar with the information contained in this affidavit based on my review of documents, my training and experience, and discussions I have had with other law enforcement personnel concerning the creation, distribution, and proliferation of child pornography. Additionally, statements

¹ Because the purpose of this Complaint is to establish probable cause to arrest, I have not set forth all of the facts and circumstances of which I am aware.

attributable to individuals herein are set forth in sum and substance and in part.

PROBABLE CAUSE

3. On February 15, 2013, detectives and officers with the New York City Police Department executed a search warrant on the home of Alberto Randazzo at 23-15 31st Avenue, Long Island City, New York, Apartment 3R pursuant to a New York State judge. The search warrant was based on information the New York City Police Department ("NYPD") had received that Randazzo had solicited women to provide him photographs of the sexual abuse of their minor children. A number of electronic devices were seized in the search.

4. Some of those devices were searched by NYPD forensic specialists following their seizure. During those searches, they discovered numerous videos depicting prepubescent children engaging in sexually explicit acts. They also discovered messages with a number of women relating to the sexual abuse of children.

5. Several series of messages are with a contact who has been identified as JENNIE LEMAY. JENNIE LEMAY is listed in Randazzo's telephone under a number of contacts, including

"Jennie Ashley," "Jennie Lemay," and "Jennie Needed." The "Jennie Ashley" contact lists a phone number, which open source searches identified to be JENNIE LEMAY's. It also lists the email addresses Jennie_Lemay@waters.com; funeeded@yahoo.com; and jlemay36@hotmail.com. Open source searches have identified that Jennie Lemay was employed by Waters Corporation, which maintains the website waters.com.

6. Between at least July 2011 and April 2012, Randazzo and JENNIE LEMAY exchanged a number of sexual chats relating to the sexual abuse of children. Specifically, Randazzo and LEMAY discussed her sexual abuse of a child who agents have determined LEMAY has regular access to ("VICTIM 1").² At the time of the texts, VICTIM 1 was approximately eight years old.

7. Specifically, on July 5, 2011, LEMAY sent Randazzo a picture that showed her face and naked breasts. Randazzo responded "Omg, now I know why [VICTIM 1] is in love with them" and "I hope that you can skype while he's sleeping and put them on his face :)" LEMAY then responded "nice idea."

² The child is identified by name in the communications between Randazzo and LEMAY, but is not identified here to protect the privacy of the victim.

8. Later in the same conversation, LEMAY states that she "will never do anything to hurt [VICTIM 1] ." Randazzo replies that "If he's sleeping and you put your boobs on his cock while I'm watching on skype that won't hurt him." LEMAY responds "well if he is sound asleep . . . he would not know."

9. On July 13, 2011, LEMAY texts Randazzo "you won't believe last night . . . you would have loved to watch . . . he is one horny little boy."

10. On September 10, 2011, LEMAY and Randazzo engage in a series of text messages about meeting in person:

LEMAY: He sleeps like a rock

RANDAZZO: Ok so should I come at like 3am?

LEMAY: He fell asleep on mommys bed last night

RANDAZZO: I get off at midnight. I can leave NYC at midnight and be there at like 3 or 4am

LEMAY: Yes baby that works

LEMAY: Come to my back door and slip inside the sliding glass door

LEMAY: Slip into bed with me and [VICTIM 1]

RANDAZZO: Ok that would be great. But are you sure you can suck his cock without waking him up?

RANDAZZO: I would want you to give him Nyquil anyway. This way he's sleeping and you can move him around, etc

. . .

LEMAY: What form is it? A pill?

RANDAZZO: Yes I think so. Would that be ok? You can tell him it's a vitamin. I hear it will make him sleep all night

RANDAZZO: Maybe we can have a skype session soon and try the pill out

LEMAY: Yes good idea

11. On September 13, 2011, Randazzo and LEMAY exchanged text messages that they would skype on Saturday. During these conversations, Randazzo asked "What will you show me on skype mommy?" LEMAY replied "What I will do with you baby. How I will suck you and your baby brother".

12. On the evening of Saturday, September 17, 2011, Randazzo and LEMAY exchanged another series of text messages:

RANDAZZO: Did you give him something to sleep better?

LEMAY: He's still awake we are out

LEMAY: I will give him something with his meds

RANDAZZO: Ok good ;) I will be home at exactly midnight.

LEMAY: K

LEMAY: He is in bed

LEMAY: I hope he learned a lesson

LEMAY: Little boys. Gotta love em

LEMAY: I will let you know as soon as he falls asleep

LEMAY: :-pwe need to teach him

RANDAZZO: Ok I'm on my way home!

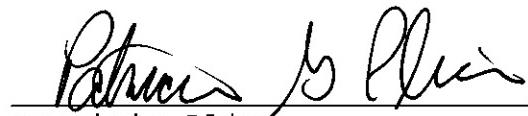
There were no more text messages that night.

13. On July 7, 2015, HSI agents interviewed LEMAY at her home. She stated in sum and substance and in part that in 2011 and 2012 she was in communication with Alberto Randazzo. Those communications often related to the sexual abuse of children. LEMAY indicated that at Randazzo's request on multiple occasions she set up video chats (using the program Skype) with Randazzo during which she would sexually abuse VICTIM 1. She said that she had touched his penis over his underwear. She also said that she had simulated sexual intercourse with VICTIM 1 during the video chats. LEMAY also said that on more than one occasion she gave VICTIM 1 drugs to keep him asleep, including Ambien, Benadryl, and melatonin, prior to these video chats.

WHEREFORE, based on the foregoing, your deponent respectfully requests that an arrest warrant be issued for the defendant JENNIE LEMAY so that she may be dealt with according to law.

Because public filing of this document could result in a risk of flight by LEMAY, as well as jeopardize the government's ongoing investigation, your deponent respectfully

requests that this complaint, as well as any arrest warrant issued in connection with this affidavit, be filed under seal.



Patricia Pliva
Special Agent
Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
7th day of July, 2015

THE HONORABLE JAMES ORENSTEIN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK